

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PRESIDENT DONALD J. TRUMP, 45th President
of the United States of America, in his individual
capacity,

Plaintiff,

v.

3:23-cv-06883- PGG

SIMON & SCHUSTER, INC., a New York
corporation, ROBERT WOODWARD p.k.a. BOB
WOODWARD, an individual, and PARAMOUNT
GLOBAL, a Delaware corporation, f/k/a Viacom
Inc., successor by merger to CBS Corporation, a
Pennsylvania corporation f/k/a Westinghouse
Electric Corporation,

Defendants.

**DECLARATION OF ELIZABETH A. MCNAMARA IN FURTHER SUPPORT OF
DEFENDANTS' MOTION TO DISMISS PLAINTIFF DONALD TRUMP'S SECOND
AMENDED COMPLAINT**

I, Elizabeth A. McNamara, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

I am a partner at the law firm of Davis Wright Tremaine LLP, attorneys for Defendants Simon & Schuster, Inc., Robert Woodward and Paramount Global (collectively, "Defendants"), and I submit this declaration in further support of Defendants' motion to dismiss the Second Amended Complaint in the above-captioned action and to supplement the November 22, 2023 declaration previously submitted in this Action. This declaration is based on my personal knowledge, except as otherwise indicated.

1. Annexed hereto as **Exhibit E** is a true and correct copy of Copyright Registration TX0009335307, registering Bob Woodward's literary work copyright for the text of *The Trump Tapes*.

2. Annexed hereto as **Exhibit F** is a true and correct copy of the Copyright Registration SR0000981326, registering Simon & Schuster's copyright for the sound recording of *The Trump Tapes*.

3. Annexed hereto as **Exhibit G** is a true and correct copy of a letter dated November 30, 2023, from the United States Copyright Office to Simon & Schuster regarding the conflicting registrations for *The Trump Tapes*.

Dated: December 6, 2023

/s/ Elizabeth A. McNamara
Elizabeth A. McNamara